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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Valentino Dimitrov, individually, and on
behalf of all others similarly situated,

Plaintiffs,

vs.

Stavatti Aerospace, Ltd, a Minnesota
corporation; Stavatti Aerospace, Ltd, a
Wyoming corporation; Stavatti
Corporation, a Minnesota corporation;
Stavatti Immobiliare, Ltd, a Wyoming
corporation; Stavatti Industries, Ltd, a
Wyoming corporation; Stavatti Niagara,
Ltd, a New York corporation; Stavatti
Super Fulcrum, Ltd, a Wyoming
corporation; Stavatti Ukraine, a Ukrainian
business entity; Stavatti Heavy Industries
Ltd, a Hawaii corporation; Christopher
Beskar and Maja Beskar, husband and
wife; Brian Colvin and Corrina Colvin,
husband and wife; John Simon and Jean
Simon, husband and wife; William
Mcewen and Patricia Mcewen, husband
and wife; Rudy Chacon and Jane Doe
Chacon, husband and wife; and DOES 1
through 10, inclusive,

Defendants.

Case No. 2:23-CV-00226-DJH

**COLVINS' JOINDER IN AND
OBJECTION TO DEFENDANTS' MOTION
FOR SUMMARY JUDGEMENT**

Defendants Brian ("Colvin") and Corrina Colvin, by and through undersigned attorney, join in
part and object in part to the remaining Defendants' Motion for Summary Judgment for Lack of

1 Standing. The Colvin Defendants join in Defendants’ Motion for Summary Judgment, but deny
2 Defendants’ allegations that Colvin used “a fraudulent facsimile of the Company president’s signature
3 lifted from a blank form non-disclosure agreement.” The Colvin Defendants Colvin also deny
4 Defendants’ allegations that Colvin took an “undisclosed and unauthorized fee of \$100,000.” These
5 false allegations are a desperate attempt by Defendants to avoid liability for their own misdeeds.

6 DATED this 4th day of April, 2025.

7 **THE LAW OFFICE OF NINO ABATE, PLC**

8 By: /s/ Nino Abate

9 Nino Abate

10 **CERTIFICATE OF SERVICE**

11 I hereby certify that on this 4th day of April, 2025, I electronically transmitted the
12 foregoing document to the Clerk's Office using the CM/ECF System for filing and transmittal
13 along with copies transmitted to all parties and counsel of record via the CM/ECF system.

14 By: /s/ Nino Abate